

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CRS, LLC,

Plaintiff,

v.

VALVE CORPORATION,

Defendant.

No. C08-00361-RAJ

DECLARATION OF KARL J.
QUACKENBUSH IN SUPPORT OF
DEFENDANT VALVE
CORPORATION'S MOTION FOR A
MORE DEFINITE DISCLOSURE OF
PLAINTIFF CRS LLC'S ASSERTED
CLAIMS AND INFRINGEMENT
CONTENTIONS

Noted for Consideration:
January 23, 2009

I, Karl J. Quackenbush, declare as follows:

1. I am a principal at Riddell Williams P.S. I am counsel of record for Defendant Valve Corporation ("Valve") in this matter. I am over the age of eighteen and competent to testify. I make this declaration on personal knowledge.

2. A true and correct copy of excerpts of Valve's First Set of Interrogatories; and Plaintiff CRS, LLC's Objections and Answers Thereto is attached as Exhibit A at 4-6.

3. A true and correct copy of CRS's Disclosure of Asserted Claims is attached as Exhibit B at 7-33.

4. A true and correct copy of my November 18, 2008 letter to CRS is attached as Exhibit C at 34-37.

1 5. A true and correct copy of Robert Rohde's December 4, 2008 letter to me is
2 attached as Exhibit D at 38-41.

3 6. A true and correct copy of CRS's Amended Disclosure of Asserted Claims
4 is attached as Exhibit E at 42-69.

5 7. Jayson Sowers and I met and conferred with CRS's counsel regarding
6 CRS's deficient disclosures of asserted claims and infringement contentions and CRS's
7 failure to answer Valve's Interrogatory No. 4 on December 5, 2008.

8 8. A true and correct copy of Jayson Sowers' December 10, 2008 letter to
9 Robert Rohde is attached as Exhibit F at 70-73.

10 9. Valve served its Preliminary Non-Infringement and Invalidity Contentions
11 on December 1, 2008.

12 10. A true and correct copy of Judge Robert S. Lasnik's March 10, 2008 Order
13 Granting Motion for a More Definite Statement of Preliminary Infringement Contentions
14 entered in Gebr Tigges GMBH & Co. KG, v. EYS Metal Sanayi Ve Ticaret Ltd. STL, Case
15 No. C07-1673RSL (W.D. Wash.) is attached as Exhibit G at 74-79.

16 I declare under penalty of perjury under the laws of the United States of America
17 that the foregoing is true and correct.

18 DATED this 8th day of January, 2009 at Seattle, Washington.

19 /s/Karl J. Quackenbush
20 Karl J. Quackenbush, WSBA # 9602
21 RIDDELL WILLIAMS P.S.
22 1001 Fourth Avenue, Suite 4500
23 Seattle, WA 98154
24 Tel: (206) 624-3600
25 Fax: (206) 389-1708
26 kquackenbush@riddellwilliams.com

Attorneys for Defendant
VALVE CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2009, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Robert Rohde

Nathan Paine

/s/Karl J. Quackenbush

Karl J. Quackenbush, WSBA # 9602

Jayson W. Sowers, WSBA # 27618

RIDDELL WILLIAMS P.S.

1001 Fourth Avenue

Suite 4500

Seattle, WA 98154

Tel: (206) 624-3600

Fax: (206) 389-1708

Email: kquackenbush@riddellwilliams.com

Email: jsowers@riddellwilliams.com

Reynaldo C. Barcelo (*admitted pro hac vice*)

BÁRCELO & HARRISON, LLP

2901 West Coast Highway

Suite 200

Newport Beach, CA 92663

Tel: (949) 340-9736

Email: rey@bhiplaw.com

Attorneys for Defendant

VALVE CORPORATION